

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NHC LLC, a Florida limited liability company,

Plaintiff,

v.

CENTAUR CONSTRUCTION COMPANY INC., an Illinois corporation, SPIRO TSAPARAS and PETER ALEXOPOULOS,

Defendants.

No. 19-cv-06332

Honorable Matthew F. Kennelly

MOTION FOR AN ORDER CHARGING SPIRO TSAPARAS'S DISTRIBUTIONAL INTERESTS IN CERTAIN LLCs

Plaintiff/Judgment Creditor, NHC LLC ("NHC" or the "Judgment Creditor"), by its undersigned counsel, requests that the Court issue a charging order against the distributional interests of Spiro Tsaparas ("Tsaparas" or "Judgment Debtor") in certain limited liability companies, pursuant to 805 ILCS 180/30-20, and states as follows:

1. After a jury trial, judgment was entered against defendants Centaur Construction Company, Spiro Tsaparas and Peter Alexopoulos jointly and severally in the total amount of \$22,272,124.34 for fraud and breach of contract plus punitive damages against the defendants individually and in particular Tsaparas in the amount of \$1,500,000.00 (the "Judgment").
2. The Judgment remains largely unsatisfied.
3. 805 ILCS 180/30-20(a) provides that, "on application by a judgment creditor of a member or transferee, a court may enter a charging order against the distributional interest of the judgment debtor for the unsatisfied amount of the judgment. A charging order constitutes a lien on a judgment debtor's distributional interest and requires the limited liability company to pay

over to the person to which the charging order was issued any distribution that would otherwise be paid to the judgment debtor.”

4. 805 ILCS 180/30-20(b) provides that “[t]o the extent necessary to effectuate the collection of distributions pursuant to a charging order in effect under subsection (a), the court may: (1) appoint a receiver of the distributions subject to the charging order, with the power to make all inquiries the judgment debtor might have made; and (2) make all other orders necessary to give effect to the charging order.”

5. On information and belief, Tsaparas holds membership and/or distributional interests in *at least* the following LLCs (collectively, the “Tsaparas LLCs”):

- (a) Triton Marine Holdings LLC

WHEREFORE, NHC LLC, the Judgment Creditor, requests the entry of an Order (a proposed Order is attached hereto as **Exhibit A**):

- (a) Charging the distributional interests of Tsaparas in the Tsaparas LLCs described above with payment of all amounts due on the Judgment; and
- (b) Such other and further relief as may be just and proper.

Respectfully submitted,

NHC LLC

By: s/ Daniel P. Jackson
One of Its Attorneys

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Dated: March 3, 2025

CERTIFICATE OF SERVICE

The undersigned hereby certifies and declares that, on March 3, 2025, a true and correct copy of the foregoing **MOTION FOR AN ORDER CHARGING SPIRO TSAPARAS'S DISTRIBUTIONAL INTERESTS IN CERTAIN LLCS** was: (i) electronically filed with the Clerk of the Court using the Court's CM/ECF system and thereby served electronically by the CM/ECF system on all counsel of record; (ii) sent to Triton Marine Holdings LLC via overnight FedEx delivered to 361 W. Chestnut Street, Suite 200, Chicago, IL 60610; and (iii) sent to Triton Marine Holdings via overnight FedEx delivered to the Illinois Secretary of State as Registered Agent, 69 W. Washington Street, 12th Floor, Chicago, IL 60602.

/s/ Keeley A. Sawyer
An Attorney for NHC LLC